

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

KIRK B. LENHARD, ESQ., Nevada Bar No. 1437
NIKKI L. BAKER, ESQ., Nevada Bar No. 6562
EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135
Email: klenhard@bhfs.com
Email: nbaker@bhfs.com

DENNIS H. HRANITZKY, ESQ. (admitted *pro hac*)
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036-6797
Telephone: 212.698.3500
Facsimile: 212.698.3599
Email: dennis.hranitzky@dechert.com

Attorneys for Plaintiff NML Capital Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR NML TO
FILE RESPONSE TO NON-PARTY VAL
DE LOIRE, LLC'S MOTION TO STAY
MAGISTRATE JUDGE'S ORDER (DKT.
#122)**

(FIRST REQUEST)

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq., and Nikki L. Baker, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq., of Dechert LLP, and non-party Val De Loire, LLC ("VDL") (collectively, VDL and NML are referred to as the "Parties"), by and through its attorney of record, Jason M. Wiley, Esq., of Kolesar & Leatham, hereby agree and stipulate, subject to the Court's approval, as follows:

1. On March 16, 2015, Magistrate Judge Ferenbach issued an order granting in part and denying in part M.F. Corporate Services (Nevada) Limited ("MF Nevada") and Patricia

1 Amunategui's Motion to Quash (Dkt. #14), granting in part and denying in part NML's Counter
 2 Motion to Compel (Dkt. #60), denying VDL's Motion to Quash (Dkt. #1), and granting NML's
 3 Counter Motion to Compel (Dkt. #10) (the "Order"). (Dkt. #101.) Any objection to the Order
 4 was due on or by March 30, 2015. (*See* Local Rule IB 3-1.);

5 2. On March 30, 2015, Intervenor Mossack Fonseca & Co. ("Mossack Fonseca")
 6 filed a Motion to Intervene (Dkt. #106), MF Nevada and Ms. Amunategui filed an Objection to
 7 Magistrate's Order Pursuant to Fed. R. Civ. P. 72 ("MF Objection") (Dkt. #107) and a Motion to
 8 Clarify the Court's Order (Dkt. #108), and VDL filed an Objection to Magistrate Judge's Order
 9 Pursuant to Fed. R. Civ. P. 72 ("VDL Objection") (Dkt. #111);

10 3. Thereafter, on April 17, 2015, MF Nevada filed a Motion for Protective Order
 11 Staying Effect of March 16 Order Pending Resolution of Objection and Motion to Clarify ("MF
 12 Motion to Stay"). (Dkt. #117.) The deadline for NML to file its response to the MF Motion to
 13 Stay was Monday, May 4, 2015;

14 4. On April 23, 2015, VDL filed a Motion for Stay of Magistrate Judge's Order
 15 [Member Case Dkt. 39] Pending Objection to Magistrate Judge's Order Pursuant to Fed. R. Civ.
 16 P. 72 [Lead Case Dkt. 111] ("VDL Motion to Stay"). (Dkt. #122.) The deadline for NML to file
 17 its response to the VDL Motion to Stay is Monday, May 11, 2015;

18 5. In light of ongoing discussions regarding compliance with the Court's Order (Dkt.
 19 #101), MF Nevada and NML filed a Stipulation for Extension of Time for NML to Respond to
 20 the MF Motion to Stay (Dkt. #130). The Court granted the Stipulation on May 5, 2015,
 21 extending the deadline for NML's response to May 14, 2015 (Dkt. #132);

22 6. In order to obviate the need to file two separate responses to the MF Motion to
 23 Stay and the VDL Motion to Stay and to conserve the parties' resources, NML requested and Mr.
 24 Wiley, on behalf of VDL, agreed to extend the deadline for NML to file its response to the VDL
 25 Motion to Stay three days, up to and including May 14, 2015, to enable NML to file one response
 26 to the motions; and

27 ///

28 ///

7. In light of the foregoing, the Parties submit that good cause exists for the Court to approve this stipulation, and respectfully request that the Court extend the deadline for NML to respond to the VDL Motion to Stay three days, up to and including May 14, 2015.

DATED this 11th day of May, 2015.

KOLESAR & LEATHAM

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Daniel S. Cereghino
Jason M. Wiley, Esq.
Nevada Bar No. 9274
Daniel S. Cereghino, Esq.
Nevada Bar No. 11534
400 South Rampart Blvd., Suite 400
Las Vegas, NV 89145

*Attorneys for Val de Loire, LLC, and
The 123 Entities*

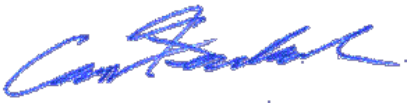
By: /s/ Nikki L. Baker
Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Dennis H. Hranitzky (admitted *pro hac*)
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036-6797

Attorneys for Plaintiff NML Capital, Ltd.

IT IS SO ORDERED.

DATED this 12th of May, 2015.



CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Nikki L. Baker
Kirk B. Lenhard, Esq.
Nevada Bar No. 1437
Nikki L. Baker, Esq.
Nevada Bar No. 6562
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
Attorneys for Plaintiff NML Capital, Ltd.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME FOR NML TO FILE RESPONSE TO NON-PARTY VAL DE LOIRE, LLC'S MOTION TO STAY MAGISTRATE JUDGE'S ORDER (DKT. #122)** was served via CM/ECF on the date shown below:

DATED this 11th day of May, 2015.

/s/ Paula Kay
an employee of Brownstein Hyatt Farber Schreck, LLP

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101